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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**KELSEY CASCADIA ROSE JULIANA;**  
**XIUHTEZCATL TONATIUH M.,** through  
his Guardian Tamara Roske-Martinez; et al.

Plaintiffs,

v.

**The UNITED STATES OF AMERICA;**  
**BARACK OBAMA,** in his official capacity as  
President of the United States; et al.,

Federal Defendants.

Case No.: 6:15-cv-01517-TC

DECLARATION OF KELSEY CASCADIA  
ROSE JULIANA In Support of Plaintiffs'  
Opposition to Defendants' Motion to Dismiss;

Oral Argument: February 17, 2016, 2:00 p.m.

I, Kelsey Cascadia Rose Juliana, hereby declare as follows:

1. I am a United States citizen and a resident of Oregon. At the time this case was filed in summer of 2015, I was nineteen years old. In November 2014, I voted in my first election. I submit this Declaration to describe the various ways in which I am and will be impacted by the Federal Defendants' actions and inactions regarding carbon pollution, which is causing climate destabilization and ocean acidification, thereby threatening the public trust resources on which I rely as a citizen beneficiary.
2. I was born in the Cascade Mountains and raised in Eugene. I was named for the forests and waters in Oregon that are sacred to my family and to me. While I attend college in Asheville, North Carolina, I often return and will continue to return to Oregon to visit my family and friends over my four years of college. I intend to reside permanently in Oregon, hopefully Eugene, after I obtain my bachelor's degree. I also plan to complete my graduate degree in the Pacific Northwest. I cannot imagine a better place to live and to raise a family some day. This region is truly my home.
3. I depend upon the clean waters of Oregon for drinking, bathing, cleaning, rejuvenation, and recreation. I drink the freshwater that flows from the McKenzie River, and I drink from other rivers when I spend time in other parts of the state. I also drink from springs in many of the Cascade lakes on hiking, canoeing, and backpacking trips. Clear Lake, Oregon is my favorite place to go to connect to the natural world. I have camped and hiked along its shores, swam and paddled canoes on its clear water, and picked and ate huckleberries along the trails. My

family has brought our exchange students from China, Italy, and Spain to Clear Lake on family nature trips. I also enjoy visiting Sahalie Falls and many other waterfalls of Oregon, as well as the natural hot springs we are fortunate to have. The freshwater of Oregon is essential to my life. I was given my first name because of Kelsey Creek, a wild and remote creek in the Cascades.

4. In addition to Oregon's freshwater, I also depend upon the marine and estuarine waters of Oregon as a food source and a place of recreation and vacationing. I grew up spending time along the Oregon coast in places like Yachats and Florence. I enjoy playing on the beach and walking barefoot in the sand. I love to go tidepooling and look for the unique marine animals that can live only in those tidepools. I love playing along the shores with my dogs. The coast has always been a favorite vacation spot for my family and me. We love the beautiful and vibrant views as a way to rejuvenate and find peacefulness, and connect our family to each other and nature.
5. Part of my diet in Oregon includes food that comes from the marine waters and from our freshwater rivers. I eat salmon, cod, tuna, and crab. I also depend upon food that is grown in Oregon by small farmers in the Willamette Valley that my family and I buy at farmers' markets. We have gardens in my front and back yard, so I know the value of local food for culture, health, and sustainability. My family has been practicing permaculture since we first moved here. We raised poultry, rabbits, bees, and grown fruits, vegetables, and medicinal herbs. These local sources of food and medicine are essential in the diet of my family and me and are important to our lifestyle.

6. For exercise and recreation, I rely upon the public trust resources in Oregon, from waters and snowfields, shores and banks, to tidelands and forests. In addition to coastal recreation, I go snowshoeing, cross-country skiing, hiking, and snow camping in the winter. I go rafting, swimming in rivers, snorkeling on rivers, canoeing on lakes, hiking, rock-climbing, and backpacking in the warmer seasons.
7. I have also grown up exploring the old growth forests of Oregon in the heart of the Cascades. These forests are very important to my happiness. My home and identity lies in the natural diversity and vibrance of the cascade bioregion. I love smelling pine and fir trees, walking on dusty trails, and feeling the sticky sap on trees. I love walking in the old growth coastal rainforests with ferns and moss around me, as well as walking in forests along the McKenzie River where I notice how wet and squishy the soil is, full of many different plants and soils and downed logs. In the Southern Oregon forests, I enjoy the drier feel of the deciduous forests with madrone and oak trees and the vibrant wildflower meadows. Experiencing the smells of the wildflowers, the sounds of the birds and the flowing streams, and the views of gentle creekbeds are all key elements of my recreational and spiritual enjoyment. Having solitude in the vastness of a healthy forest is vital to my wellness and is how I find a spiritual connection in my life.
8. While I am recreating and enjoying nature, I like to view hummingbirds, eagles, butterflies, bees in wildflower meadows, elk and deer, beavers, foxes, and bears. One of the most spectacular views for me and a place of spiritual connection is gazing at alpine lakes in the Cascades, where I meditate and swim at sunrise to start my day in nature.

9. I also like rocks and desert ecosystems. I enjoy hiking through lava rocks and rockclimbing in Eastern Oregon near Smith Rock and Sisters. I do those activities in the summer when the weather is hotter, but manageable with Oregon's climate. When the heat is too extreme I have walked into the base of Smith Rock, but I will not climb. With increasing temperatures and more extreme heat days, more summer days have become unbearable there. I love visiting Smith Rock with my family regularly in the summer months, cooling off in the river after a day under the sun. We're planning on bringing our exchange student to Smith Rock early this summer, however we may be unable to if we get another unusually hot and dry summer, seeing as it is uncomfortable and sometimes dangerous.
10. With warming temperatures will come more harm to our water systems. For instance, some of the lakes I visit suffer from algal blooms that prohibit swimming in the lakes or even filtering water for drinking. The water is toxic to human and animal life and has made me ill. I've gotten sick from parasites twice in my life from drinking filtered water from Oregon alpine lakes while on backpacking trips.
11. The projections for Oregon's water supply and drought in the coming decades scare me. I understand from experts that we could lose half of our snowpack by the middle of this century. My family has been taking me to snowy places like Odell Lake, Willamette Pass, Hoodoo, Mt Bachelor, and Mr. Fuji since I was very young, and I look forward to winter recreating in these beautiful places all year. The Oregon Mountains are truly remarkable, and I love exploring them in the summer and winter, under sun and snow. The last two winters I have been unable

to go snowshoeing and skiing with my family for our normal winter recreating because of the severe decrease in snow. Drought is affecting all of the places in Oregon I love, and is affecting my drinking water and food sources, like salmon, of which I've noticed less availability. I fear that salmon such as Chinook, the Oregon state fish, will become increasingly threatened due to increased water temperatures, drought, and other factors such as sedimentation and snowpack levels, and will therefore be cut out of my diet to help ensure their population survives. Drier and warmer seasons have affected our food production in our gardens and our family is having to make changes to our planting and harvesting schedules. The increasing temperatures are also increasing the number of pests that affect the crops in the Valley.

12. I understand that the waters off of the Oregon coast are so acidic already from carbon dioxide that they no longer sustain oyster hatcheries and our shellfish is at risk.
13. I understand that the seas are rising and our coastline and beaches too will be impacted. Already I have observed increased erosion due to sea rise around the town of Yachats, where the roads are eroding in and homes and infrastructure are threatened due to eroding banks. I've talked with locals in Yachats, and they told me about plans to remake the road and move buildings inland. I want to continue to be able to visit Yachats throughout my life, and I'm concerned about my future ability to enjoy this scenic part of the Oregon coast.
14. I have been run out of camping because of wildfires and weather extremes. I understand that I will continue to face an increased incidence of cancelled

camping trips if carbon emissions are not significantly and urgently reduced.

During the increasing number of heavy rain events, the entrance to our house floods, our gardens get oversaturated, and food falls off trees and plants and rots, resulting in a loss of food production and damaged soils. I worry about the risks and damages my home will face considering its location and the more frequent extreme weather events hitting my home region.

15. I have friends who are climate refugees, people who have already been displaced from their homes outside of Oregon due to climate impacts. I understand that Oregon is a place that may see a significant influx of climate refugees in the future as more and more people are displaced, putting more pressure on our state public trust resources.
16. One of my greatest fears is that the areas I visit and the wildlife (both animals and forests) will not be able to survive and adapt quickly enough to climate change caused by these Defendants. I feel distressed about these impacts of climate change, such as beloved lakes and rivers throughout the state drying up from drought and the subsequent loss of biodiversity in those unique water systems. Seeing the current changes to the home I love make me sad and concerned. I find my inner self in wildlife and in wilderness and I feel disconnected from myself when I think about how those things will suffer from climate change and ocean acidification due to carbon pollution caused by these Defendants.
17. Even though I graduated from South Eugene High School in June 2014, I delayed starting college so that I could walk 1,600 miles in the Great March for Climate Action from Nebraska to Washington D.C. I believe that climate change is the

most pressing issue my generation will ever face, indeed that the world has ever faced. This is both an environmental and a human rights issue. I also believe that if our governments pay attention to the science and act as public trustees, we can solve this problem and protect not only my generation, but future generations. So I marched for 1,600 miles alongside corn fields, highways, inner cities, urban sprawl, and mountainous countryside, all of which I could see the effects of climate change on the land and communities. I went on this March to meet people who have been affected by climate crisis and to experience their struggles and witness their stories firsthand. I went on this March to raise awareness and to educate people. Marching was a testament to how important climate action is to me and important it is to walk the talk and create awareness.

18. On the Great March for Climate Action, I met many people who also are harmed by carbon pollution and I experienced more harms myself. I walked through areas of the country where we had to wear masks, especially in Pennsylvania where our path included industrial plants, extraction sites, and fossil fuel facilities. We had to cover our faces in order to protect our lungs as we walked on public thoroughfares across our country. We met people who had developed cancer from pollution; people who had lost loved ones from methane pollution; and people who experienced their waterways on fire. I experienced emotional hardship that has stayed with me from hearing devastating stories of fossil fuel impacts to innumerable Americans along the March, from coal to fossil fuel combustion to organic farmers who cannot maintain their farms because of fracking wells lining their property.



19. *As I marched across the country, I experienced our nation's fossil fuel devastation caused by these Defendants.* The impacts of a warming planet; temperatures exceeding 100 degrees, especially in Nebraska and Iowa; lost food crops due to drought and heat.
20. Because I delayed my first semester of college, I will finish my freshman year in winter term of 2015. I attend a college based on a farm, where we cultivate our own food and have acres of forests to practice ecological forestry. I attend this college because I want to learn to live a self-sufficient and sustainable life, and because of their excellent environmental studies courses, ethics, and mission to be a steward of the land. My academic and career interests focus around green city planning and building design, sustainable food production, environmental education, and environmental policy and justice work. I'd also love to work with kids and in the outdoors. I hope to have a family and children, pets, gardens and live in a home that will be stable and safe and I will not have to move from because of climate or financial crisis. I hope to be able to continue to do all of the things I have described doing above for my life, my health, and my enjoyment. I also hope to be able to share those experiences, these Oregon waters, and these food sources with my children one day. I fully intend to live that life.
21. I reuse and recycle, I conserve energy, I reduce my waste, I buy local, I bike everywhere I can, I do what I can personally to live a low carbon footprint life. I know that I alone cannot protect the essential resources on which I depend, and my children will depend.

I certify under penalty of perjury in accordance with the laws of the State of Oregon, and to the best of my knowledge, that the foregoing is true and correct.

DATED this \_\_6th\_\_ day of January, 2016 at Eugene, Oregon.

A handwritten signature in blue ink, appearing to read "Kelsey Cascadia Rose Juliana", is positioned above a horizontal line.

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KELSEY CASCADIA ROSE JULIANA